REMARKS

This amendment is filed in conjunction with an RCE application, in order to place this application in condition for allowance. Specifically, claims 1-10 are canceled and independent claim 11 has been amended to clearly define over the cited art of record.

A FINAL Office Action was mailed on Nov. 30, 2005, which rejected claims 1-3 under 35 U.S.C. 103(a) as allegedly unpatentable over Beak US 6,697,135 in view of Kim US 5,693,285. Claims 11-12 were rejected under 35 U.S.C. 103(a) as allegedly unpatentable over Bijlsma US 20010045560 in view of Suzuki US 6,801,274. Claim 13 was rejected under 35 U.S.C. 103(a) as allegedly unpatentable over Bijlsma US 20010045560 in view of Ahn US 20010040665. Claims 4 and 8-10 were rejected under 35 U.S.C. 103(a) as allegedly unpatentable over Beak in view of Kim, further in view of Watanabe US 5,093,738. Claims 14-17 were rejected under 35 U.S.C. 103(a) as allegedly unpatentable over Bijlsma in view of Suzuki, further in view of Brewer US 4,876,165. Claims 14 and 18-20 were rejected under 35 U.S.C. 103(a) as allegedly unpatentable over Bijlsma in view of Ahn, further in view of Watanabe US 5,093,738.

Applicant has canceled claims 1-10, amended independent claim 11, and added new claim 29 to more clearly identify novel and non-obvious aspects of embodiments of the invention.

Claim 11

Among other defining features, amended claim 11 recites "wherein the transparent organic planarization layer has a first portion and a second portion, ***the first portion is thinner than the second portion***, and the first portion corresponds to the transmissive portion and the

second portion corresponds to the reflective portion". The FINAL Office Action states that Bijlsma fails to teach a planarization over the color filter. However, the Office Action alleges that Suzuki teaches an organic planarization layer (overcoat layer) formed over a color filter to protect color filter. Applicant respectfully traverses this application of the prior art.

In this regard, Applicant respectfully submits that the color filter taught by Bijlsma is formed on an array substrate with uneven surface structure (i.e., with concave and convex structure). Moreover Bijlsma's color filter is formed by coating fluid color resist to achieve various thicknesses. Bijlsma's color filter, therefore, has an uneven lower surface and a planar upper surface, and is dependent on the substrate structure. As Bijlsma's color filter includes planar upper surface, there is no motivation for those skilled in the art to form another planarization layer ***with different thickness portions*** on the Bijlsma's color filter with planar upper surface.

For at least this reason, claim 11 patently defines over the cited art. As claims 12-20 and 29 directly or indirectly depend from claim 11, claims 12-20 and 29 are patentable by virtue of their dependency from patentable claim 11.

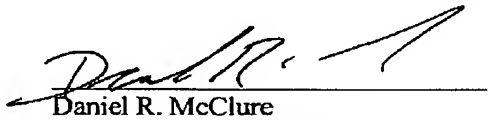
In addition, and with regard to new claim 29 recites "the color filter comprises a substantially planar bottom surface." The color filter as claimed in claim 29 is formed by half-tone photolithography, thereby creating an uneven upper surface. The bottom surface of the color filter is substantially planar and independent from the substrate structure.

For all of these reasons, applicant submits that this application is now in condition for allowance. Prompt issuance of a Notice of Allowance is earnestly solicited.

For all of these reasons, Applicants submit that this application is now in condition for allowance. Prompt issuance of a Notice of Allowance is earnestly solicited.

A credit card authorization is provided herewith for the RCE filing fee. No additional fee is believed to be due in connection with this amendment and response. If, however, any additional fee is deemed to be payable, you are hereby authorized to charge any such fee to Deposit Account No. 20-0778.

Respectfully submitted,



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